

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No. 1:23-cv-00108-LMB-JFA

**GOOGLE LLC’S MOTION TO EXCLUDE  
THE TESTIMONY OF PROF. ROBIN S. LEE**

PURSUANT TO Rules 403 and 702 of the Federal Rules of Evidence and Rules 26 and 37 of the Federal Rules of Civil Procedure, Defendant Google LLC (“Google”) moves the Court to exclude the testimony of Robin S. Lee, PhD (“Lee”) on market definition and market share calculations. The grounds and reasons for granting this motion are stated with particularity in the accompanying memorandum of law and exhibits to the Declaration of Bryon Becker in Support of Google’s Motion for Summary Judgment and Motions to Exclude.

A proposed Order is submitted herewith.

Dated: April 26, 2024

Eric Mahr (*pro hac vice*)  
Andrew Ewalt (*pro hac vice*)  
Julie Elmer (*pro hac vice*)  
Lauren Kaplin (*pro hac vice*)  
Scott A. Eisman (*pro hac vice*)  
Jeanette Bayoumi (*pro hac vice*)  
Claire Leonard (*pro hac vice*)  
Sara Salem (*pro hac vice*)  
Tyler Garrett (VSB # 94759)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
700 13th Street, NW, 10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4500  
Facsimile: (202) 777-4555  
eric.mahr@freshfields.com

Daniel Bitton (*pro hac vice*)  
AXINN, VELTROP & HARKRIDER LLP  
55 2nd Street  
San Francisco, CA 94105  
Telephone: (415) 490-2000  
Facsimile: (415) 490-2001  
dbitton@axinn.com

Bradley Justus (VSB # 80533)  
AXINN, VELTROP & HARKRIDER LLP  
1901 L Street, NW  
Washington, DC 20036  
Telephone: (202) 912-4700  
Facsimile: (202) 912-4701  
bjustus@axinn.com

Respectfully submitted,  
/s/ Craig C. Reilly

Craig C. Reilly (VSB # 20942)  
THE LAW OFFICE OF  
CRAIG C. REILLY, ESQ.  
209 Madison Street, Suite 501  
Alexandria, VA 22314  
Telephone: (703) 549-5354  
Facsimile: (703) 549-5355  
craig.reilly@ccreillylaw.com

Karen L. Dunn (*pro hac vice*)  
Jeannie S. Rhee (*pro hac vice*)  
William A. Isaacson (*pro hac vice*)  
Amy J. Mauser (*pro hac vice*)  
Martha L. Goodman (*pro hac vice*)  
Bryon P. Becker (VSB # 93384)  
Erica Spevack (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Facsimile (202) 223-7420  
kdunn@paulweiss.com

Meredith Dearborn (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Facsimile: (202) 330-5908  
mdearnborn@paulweiss.com

Erin J. Morgan (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3387  
Facsimile: (212) 492-0387  
ejmorgan@paulweiss.com

*Counsel for Defendant Google LLC*